

Construction Ecological Management Plan

Land Off High Street, Sutton Benger,
SN15 4SP, Wiltshire

22 July 2026

Ecology
Arboriculture
Land Management





Site Details

Site Name and Location	Land Off High Street, Sutton Benger, SN15 4SP, Wiltshire
Central OS Grid Reference	ST 950 788
Client	Charles Church

Report Details

Report Title	Construction Ecological Management Plan
Report Reference	3112-CEMP-MS

Quality Assurance & Revision Record

Revision	Date	Author	Checked By	Approver	Summary of Changes
REV 1	22 July 2026	Lindsay Taylor BSc MSC ACIEEM	Lindsay Taylor BSc MSC ACIEEM	Nick Hargreaves BSc MSc MCIEEM	
FINAL	4 December 2025	Meike Simms BSc ACIEEM	Lindsay Taylor BSc MSC ACIEEM	Lindsay Taylor BSc MSc ACIEEM	

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1 Introduction

This report has been produced by GE Consulting on behalf of Charles Church for a development at Land Off High Street, Sutton Benger, SN15 4SP, Wiltshire.

The area within the application boundary is hereafter referred to as the 'Site'.

1.1 Background

The Site was given outline planning permission at appeal in January 2025 (planning ref: PL/2023/06204) for 'Outline planning application for the erection of up to 60 dwellings, including affordable housing with public open space, structural planting and landscaping, land for the provision of allotments and sustainable drainage system (SuDS) with vehicular access point. All matters reserved except for means of access'.

The outline application was accompanied by an Ecological Impact Assessment (EclA) report (CSA Environmental 2023a) and Biodiversity Net Gain Assessment report (CSA Environmental 2023b) which detailed various surveys undertaken in 2022.

This report is to accompany a reserved matters application.

1.2 Aims

This report was commissioned in order to discharge Condition 15 and 18 to accompany a reserved matters planning application. The conditions state:

"Condition 15 - Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.*
- b) Working method statements for protected/priority species, such as nesting birds and otter.*
- c) Sensitive lighting strategy to ensure retained hedgerows and the river corridor are maintained as dark corridors throughout construction.*
- d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.*
- e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).*
- f) Pollution prevention measures including the location of site and storage compounds, the use of plant and machinery, measures to control of dust and noise, the location and use of wheel washing and vehicle washdown plant/machinery, and the location and use of oils/chemicals; g. the use and routing of heavy plant and vehicles.*

Development shall be carried out in strict accordance with the approved CEMP.

Condition 18 - Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of features for biodiversity (in accordance with Paragraph 5.45 of the Ecological Impact Assessment, August 2024) shall be submitted to the local authority for approval. These details should be clearly shown on a relevant enforceable plan (e.g. site plan/technical elevations drawing/boundary treatment plan).



The approved details shall be implemented before occupation of the final works. These features will continue to be available for the target species for the lifetime of the development.”

This document should be read in conjunction with the Landscape and Ecology Management Plan (LEMP) (GE Consulting, 2025), Lighting Strategy (Pegasus, 2025, ref: P25-2384-PEG) and Landscape Proposals (e.g. Golby+Luck Landscape Architects 2025).

The contractor will keep a copy of this document on site at all times and ensure that the workforce is aware of its contents.

2 Roles & Responsibilities

2.1 Contact Details

Ecological queries should be made to GE Consulting, as detailed below.

Role	Organisation	Address	Phone/ email
Client	Charles Church	Charles Church Wessex, Verona House, Tetbury Hill, Malmesbury, SN16 9GY	thomas.bostock@charleschurch.com 01666 824721
Ecological Clerk of Works (ECoW)	GE Consulting	Unit 11 Gidleys Meadow Business Park, Christow, Devon, EX6 7QB	info@ge-consulting.co.uk 01647 253652
Principal Contractor	TBC	TBC	TBC
Pollution incidents	The Environment Agency	Horizon House, Deanery Road, Bristol, BS1 5AH, United Kingdom	24hr incident hotline 0800 80 70 60

2.2 Ecological Clerk of Works

An ecological clerk of works (ECoW) will be present during certain tasks.

The roles and responsibilities of the ECoW are:

- 👉 Understanding of ecological features and constraints, including sensitive timings;
- 👉 Knowledge of construction risks and proposed biodiversity protection zones;
- 👉 Understanding of ecological mitigation, compensation and enhancements proposed and knowledge of methods to achieve them;
- 👉 On site practical undertaking of clerk of works to avoid/ reduce ecological impacts and provision of ecological advice;
- 👉 Regular reporting to client, site manager and principal contractor;
- 👉 Monitoring and reporting on unplanned incidents and compliance with legal, planning and contract requirements, including a record to demonstrate that the required mitigation and/or compensation measures identified in the CEMP have been completed. This shall be submitted to the Local Planning Authority for approval within 3 months of the date of substantial completion of the development or at the end of the next available planting season, whichever is the sooner.

2.3 Project Ecologist

To ensure the successful delivery of the measures for the protection and enhancement of biodiversity described in this CEMP, a **Project Ecologist**¹ will be appointed to liaise with the site team and advise on all ecological matters.

- 👉 Prior to the commencement of any demolition/ ground works, the Project Ecologist or their agent will deliver a 'Toolbox talk' to contractors, covering their legal responsibilities, relevant ecological

¹ The Project Ecologist will oversee/ manage the ecology elements of the project, but may delegate any specific tasks to another suitably qualified ecologist.

constraints, including the location of protected species or sensitive habitats, any areas to be avoided and what to do in the event of a protected species being found. Refer to **Figure 1**.

- 🦋 All contractors will be required to sign a log at the toolbox talk and they will be legally responsible for their own actions on Site;
- 🦋 The Project Ecologist will be informed of all forthcoming activities so that they can communicate any requirements (e.g. timings constraints, licenses, Ecological Clerk of Works (ECoW)) to the site team to ensure activities are undertaken in accordance with this strategy and current legislation/best practice guidance);
- 🦋 The Project Ecologist will be contacted if there are any unexpected finds or ecological issues arising and they will advise on the appropriate course of action;
- 🦋 A log will be maintained during the enabling and construction phases to record any species found, (including unexpected finds) and the mitigation measures undertaken during each development phase.

2.4 Incident Recording

Appendix 1 provides record sheets which the Principal Contractor will use to document actions taken to protect biodiversity and monitor their effectiveness during the construction process.

2.5 Procedure to Follow if Protected Species are Discovered

In the event that any protected species (including bats, reptiles, otters, badgers and nesting birds) are found during construction works, all works will stop immediately, and advice sought from an ECoW immediately on how to proceed.

3 Ecological Features and Protection Zones

All site personnel should be aware of the key ecological features:

- 🦉 Hedgerows, trees and watercourses present on, or adjacent to, Site;
- 🦉 Sutton Benger Brook on the northern boundary is connected to Bristol Avon River LWS, which supports otters; and
- 🦉 Vegetation supporting commuting/ foraging bats, nesting birds, badgers, hedgehogs or reptiles.

A risk assessment of damaging activities has been undertaken, and the following ecological features will be safeguarded as part of the **Biodiversity Protection Zones (BPZs)** illustrated in **Figure 1**:

- 🦉 Hedgerows, except those requiring removal for access;
- 🦉 Tree root protection areas;
- 🦉 River protection areas to protect Sutton Benger Brook and connected Bristol Avon River LWS; and
- 🦉 Dark corridor for bats maintained on hedgerow, trees and watercourses.

No clearance, storage or construction activities will take place within these zones unless agreed by an ecologist.

4 Timetable for Ecological Mitigation

4.1 Construction Timetable

Construction is expected to commence in Q3 of 2026 and be completed in 2028.

4.2 Programme for Ecological Work

Certain activities are seasonally constrained due to ecological, legal or licensing periods.

The below timetable shows when specific measures need to be undertaken to avoid or reduce impacts. Methodologies are provided in **Section 5** below.

Task	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Installation of Biodiversity Protection Zones	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Vegetation removal under ECoW supervision			✓	✓	✓	✓	✓	✓	✓	✓		
Hedgerow, scrub and tree removal	✓	✓							✓	✓	✓	✓
Update badger survey c. 6 weeks prior to construction	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

5 Method Statements

5.1 Pre-construction Phase

The below section defines the practical avoidance measures to be undertaken prior to construction to protect ecological features, minimise adverse impacts and prevent any breaches of legislation; also illustrated in **Figure 1**, which shows **Biodiversity Protection Zones**.

5.1.1 Habitat Protection

5.1.1.1 Hedgerow/Tree/Watercourse

Install temporary fencing around retained hedgerows, trees and watercourses in line with BS5837:2012 prior to commencement and for the duration of construction, see **Figure 1**. This should be installed outside the nesting bird season or be preceded by a check by the ECoW to check for the presence of nesting birds that could be subject to disturbance. The tree protection fencing will be maintained throughout the construction phase and will be subject to regular checks to ensure it is still intact.

The protection of the habitats will also serve to protect the breeding birds and commuting/foraging bats, reptiles, otters and badgers that the habitat provides suitability for.

Pollution prevention measures will be enacted so that the trees do not become degraded by any particulate matter arising from the works. A suitably qualified pollution specialist will advise on the solid waste and soluble discharge pollution prevention measures to be implemented during and after works.

5.2 Habitat removal

5.2.1.1 Nesting Birds – Working Method Statement

Birds may nest in suitable habitat such as trees, hedgerow, scrub and grass. The following safeguards and reasonable avoidance measures will be required during construction to prevent the direct loss of active nests during Site preparation works and to minimise noise and visual disturbance to nesting birds in close proximity to construction areas:

To ensure complete protection of nesting birds the following actions will be implemented:

- 👉 The use of tree protection fencing around retained habitat will minimise the potential disturbance, which may occur from noise and plant tracking close to active nests by providing a buffer.
- 👉 Preferably trees, hedgerow, scrub and grassland scheduled for removal will be removed or cut down to ground level outside the bird breeding season (e.g. cutting between September and February inclusive).
- 👉 Removal of trees, hedgerow, scrub and grassland inside the bird nesting season (e.g. removal between March and August inclusive) will require a nesting bird inspection immediately prior to (maximum of 48 hours in advance of) the commencement of work.
- 👉 If nesting birds or birds constructing a nest are subsequently identified to be present, work in that area must cease until the nest is clear. Should nesting birds be found, a minimum 5m no disturbance buffer would need to be provided, with work not allowed to commence in this area until the chicks have fledged or until the nests are no longer active.

Regardless of timing of work or results of previous surveys, if nesting birds are found within the development Site during any part of the construction phase, then work should stop and a qualified ECoW consulted.

5.2.1.2 *Reptiles*

In order to protect reptiles which could be present onsite during construction and enabling works, hedgerow/ hedge bank removals shall be preceded by a check of the bases for reptiles. This will be undertaken within the active season (March to October) and during suitable weather conditions (i.e. no heavy rain and temperature above 10°C) by a suitably experienced ecologist. Any reptiles found shall be moved to retained sections of the hedgerow, at a suitable distance from the construction footprint e.g. retained northern boundary etc.

5.2.1.3 *Badger*

An update badger survey will be undertaken no longer than six weeks prior to works commencing to confirm the status of the badger setts. Any active setts that will not be impacted by site clearance/ construction activities will have a 20m buffer clearly marked out. No works or storage of equipment will take place within this buffer.

5.3 Construction Phase

The below section defines the practical avoidance measures to be undertaken during construction to protect ecological features, minimise adverse impacts and prevent any breaches of legislation.

5.3.1 *General Environmental Measures*

This section outlines the principles and measures for protecting the Sutton Benger Brook/ Bristol Avon River LWS and managing site runoff during construction.

Construction activities have the potential to pollute third-party land off-Site, and therefore subsequently the Sutton Benger Brook adjacent to the Site and the connected Bristol Avon River LWS. This may occur through:

- 👉 Alterations to hydrology caused by excavations (i.e., during groundworks).
- 👉 Silt and sediment runoff.
- 👉 Accidental spills of polluting substances (e.g. hydrocarbons).

The contractor must ensure that surface water runoff and groundwater from excavations are prevented from discharging from the Site using the below strategy.

5.3.1.1 *Pollution*

Pollution prevention measures will be used across the site to protect the hedgerows, woodland, trees, ditches and watercourses. The Flood Risk Assessment & Outline Surface Water Drainage Strategy (LDE, 2023) will be implemented in full to avoid/ mitigate pollution prevention measures. This will incorporate measures included in the Government Guidance 'Pollution prevention for business' including the following, as required:

- 👉 Construction activities within 25m of waterbodies/ courses will be avoided during heavy rain to minimise risk of sediment or pollution entering water;
- 👉 A silt fence will be installed along the perimeter of the adjacent river to prevent sediment runoff into Sutton Benger Brook and connected Bristol Avon River LWS, as well as other nearby watercourses and surrounding areas;
- 👉 Heras fencing will be erected around the BPZs (see Figure 1) to secure the area and prevent unauthorised access;
- 👉 No materials or machinery, or storage compounds will be permitted within the standoff zone to minimise risk of contaminated runoff entering waterbodies at times of high rainfall;

- 👉 Reducing the need for dewatering through the prevention of water entering excavations;
- 👉 Minimising the amount of exposed ground and soil stockpiles. Materials will be covered where practicable;
- 👉 The use of silt fences or temporary drainage channels at the base of stockpiles will be used to block or divert runoff;
- 👉 On-site silt settlement systems will be installed between dewatering points and discharge points, where necessary.
- 👉 Preventing run-off from wet concrete by avoidance of mixing during wet weather;
- 👉 Refuelling, plant and wheel washing in designated areas at least 15 metres from any watercourse, surface drain or potential pollution pathway;
- 👉 Construction plant will undergo regular maintenance to prevent leaks and spills; and
- 👉 A spill kit must be kept on site.

The Environment Agency will be contacted in the event of a pollution incident to a watercourse.

5.3.2 Monitoring and Compliance

- 👉 Routine inspections will be carried out to ensure all measures are implemented effectively.
- 👉 Findings will be recorded, and corrective actions will be taken promptly if issues arise.
- 👉 Communication of the plan to all Site staff will occur during inductions and toolbox talks. Updates will be provided as necessary.

5.3.3 Risk Assessment of Potentially Damaging Construction Activities

At the time of appointing groundwork contractors, full compliance of risk assessments will be adhered to. As part of this commitment, contractors will be actively engaged once appointed, incorporating them into a collaborative framework to assess and manage risks throughout the development process. Regular checks will be conducted to monitor compliance with the risk assessment guidelines and to address any potentially damaging construction activities. These activities will be rigorously assessed for their potential environmental, structural, and safety impacts, with necessary mitigation measures implemented to prevent or minimise damage.

5.3.4 Dust

All contractors will be expected to comply generally with the recommendations of the Control of Substances Hazardous to Health (COSHH) 2002 for minimising dust levels during the execution of the works, and current regulations.

Stockpiles of materials to be dampened down or seeded to ensure dust control. Airborne dust will be kept to a minimum by the regular wetting down of haul roads and pre-excavated areas, and notices will be erected to stipulate that the above measures are adhered too.

5.3.5 Noise

All contractors will be expected to comply with the recommendations of the Code of Practice for Noise and Vibration Control on Construction and Open Sites BS 5228: Part 1, clause 9.3 for minimising noise levels during the execution of the works, and current regulations.

The existing buffer of vegetation between the Site and watercourse will be retained and enhanced to reduce disturbance and provide screening. Hoarding will be erected along the Site boundary to reduce visual disturbance and help attenuate noise.

5.3.6 Hedgerow

Retained hedgerows will be maintained in their current state (e.g. routine management to keep them tall and bushy) with no significant decrease in height or width during construction. Maintain fencing in accordance with Arboricultural Impact Assessment (CSA Environmental, 2023).

5.3.7 Lighting

No construction lighting will be permitted to spill onto retained hedgerows, watercourses, ditches and trees to protect animals such as bats, badgers, otters or hedgehogs.

Construction will be restricted to daylight hours, finishing at least 30 minutes before sunset and commencing at least 30 minutes after sunrise. Where this is not possible, any necessary lighting will be directed away from the Site boundary vegetation. Lighting should be directed where needed by the use of hoods and cowls. Motion sensor lighting should be considered where possible as this reduces impacts upon nocturnal species while reducing power output and running costs.

5.3.8 Badger

As badger may cross the Site at night, the following measures will be undertaken:

- 🦡 Any trenches or large excavations are to be covered or left with a means of escape such as a roughened plank of wood placed in the trench as a ramp/ ladder to the surface. Any large bore pipes will be capped at the end of the day to reduce the potential for wildlife to enter and become trapped;
- 🦡 The storage of topsoil or other 'soft' building materials in the Application Site will be given careful consideration. Badgers will readily adopt such mounds as setts. So as to avoid the adoption of any mounds, these will be kept to a minimum and any essential mounds subject to daily inspections (or nightly patrols if 24-hour security is present at the Site) with consideration given to temporarily fencing any such mounds to exclude badgers;
- 🦡 Fencing to ensure badger and other species still have access to surrounding landscape, for example allowing a 150mm gap below security/ temporary fencing.
- 🦡 The storage of any chemicals will be contained in such a way that they cannot be accessed by any roaming badgers / other mammals; and
- 🦡 Food and litter will not be left within the working area overnight.
- 🦡 In the unlikely event of a badger (or any other animal) becoming trapped or injured during construction the RSPCA must be called immediately and the appropriate action undertaken.

5.3.9 Hedgehogs

During the construction and enabling works, there is potential to harm hedgehog. The measures outlined for badgers above will also ensure that hedgehogs will be safeguarded. Any individuals encountered during enabling works will be moved to a place of safety, namely the retained boundaries and habitats in the southern section of the Site.

5.3.10 Nesting Birds

Measures described above in relation to Habitat Clearance prior to construction commencing (Section 5.2) will also be implemented throughout construction should further impacts to suitable nesting habitat be required.

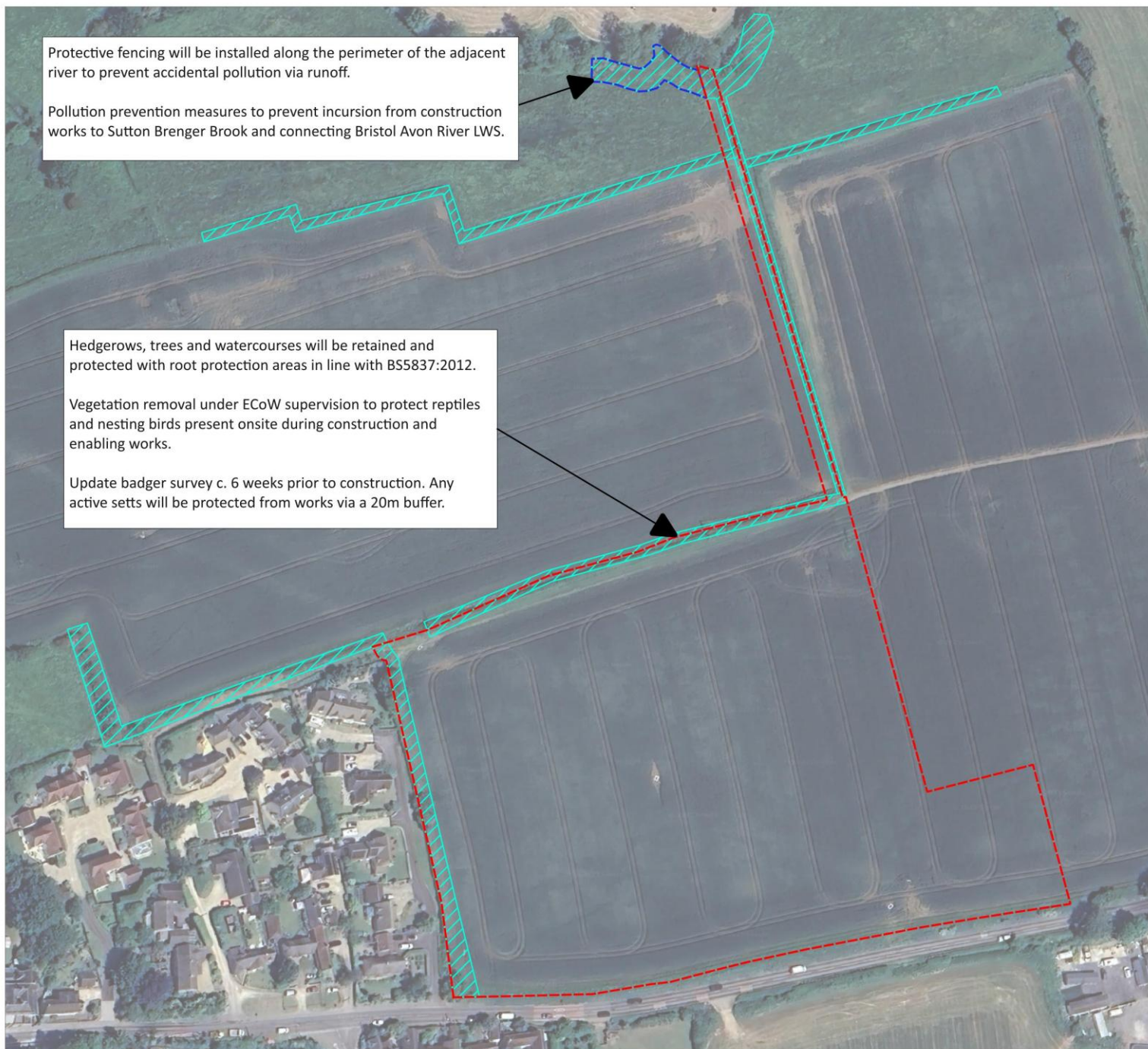
5.3.11 Otter

Protective fencing will be installed along the riparian corridor (corridor to include the river itself as well as at least 10m of bankside habitats) during construction to ensure no impacts occur to otter and/ or their habitat. Access will be permanently restricted along the river to prevent potential effects from human activity, pets and lighting during both construction and operation.

Measures detailed above to prevent degradation of the riverine and riparian habitat via pollution events and other general environmental pathways (Section 5.2) will ensure otter can continue to utilise these habitats.

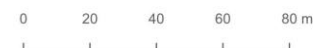
6 Construction Monitoring

Appendix 1 provides record sheets which the Principal Contractor will use to document actions taken to protect biodiversity and monitor their effectiveness during the construction process, with key elements checked by an ecologist/ arboriculturist as appropriate.



Key:

- Site Boundary
- Wider Survey Area
- Biodiversity Protection Zones



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Figure 1:
Biodiversity Protection Zones

Project:

Land Off The High Street, Sutton Benger, SN15 4SP

Client:

Persimmon Homes

Date:

28/10/2025

Drawn:

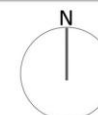
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Appendix 1 – Construction Ecological Mitigation Records Sheets

The following form should be used to record actions taken to protect biodiversity and monitor their effectiveness during the construction process. Signatures should be provided where applicable.

DAILY RECORD OF ECOLOGY MATTERS

To be used as and when required by the Principal Contractor/ site team to keep a record of ecology incidents and procedures undertaken to minimise adverse effects.

If any protected species is found, or in the event of any potentially damaging incidents, the appointed ecologist should be contacted for advice.

Date:		Reported By:	
Summary of Incident/ Activity:			
Ecologist Contacted:	Yes: ☐ No: ☐ N/A: ☐		
Action Taken:			
Outcome (if appropriate):			



Appendix 2 – Tree Protection Plan

Figure 1: Example of a protective barrier

The diagram illustrates a protective barrier system. It features a large rectangular steel mesh panel (1) supported by a vertical post (2). A diagonal strut (3) connects the post to the base. The base is secured by a block foot (4) and a weighted tray (5) containing several blocks. The entire assembly is shown on a ground surface.

1. Steel mesh panel
2. Connectors fitted to secure panels
3. Diagonal strut
4. Block feet to avoid driven scaffold poles
5. Block tray weighted with blocks

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Website: www.ge-consulting.co.uk
Phone: 01647 253652
Email: info@ge-consulting.co.uk

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GE Consulting Services (UK) Ltd
registered number 08435536

Registered office: Unit 11A, Gidleys
Meadow Business Park, Christow,
Devon, EX6 7QB.
VAT Number 160595992

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